

REMARKS

The applicant notes that the office action does not include an acknowledgement of the claim for priority under section 119 or that all of the certified copies of the priority documents have been received. Accordingly, attached hereto is a copy of:

- OIPE hand delivery filing receipt, stamped by OIPE on March 4, 2004, acknowledging receipt of items including the Japanese priority document JP2003-078706; and
- Stamped postcard receipt of March 4, 2004 acknowledging receipt of items including the Japanese priority document JP2003-078706.

A postcard receipt which itemizes and properly identifies the items which are being filed serves as *prima facie* evidence of receipt in the USPTO of all the items listed thereon on the date stamped thereon by the USPTO. Inasmuch as the above items are properly itemized on the postcard receipt and the filing receipt, it is respectfully submitted that the priority document was submitted and a claim for priority under section 119 should be acknowledged. Acknowledgment thereof is respectfully requested.

The applicant acknowledges and appreciates receiving an initialed copy of the form PTO-1449 that was filed on March 4, 2004.

Claims 1 – 6 are pending. The applicant respectfully requests reconsideration and allowance of this application in view of the above amendments and the following remarks.

The specification was objected to for a typographical error appearing in the specification. The error is corrected in the above amendment. Withdrawal of the objection is respectfully requested.

Claims 1 – 3 were rejected under 35 USC 112, first and/or second paragraphs, as failing to be enabled and/or as being indefinite. The office action identified particular language in claim 1 that was allegedly unclear. Claim 1 has been carefully reviewed and revised to clarify the instances of indefiniteness identified in the office action. Reconsideration and withdrawal of the rejection is respectfully requested.

Claims 1 and 3 were rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 6,505,512, Geen et al. (“Geen”). Claims 1 and 3 were also rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 6,776,043, Campbell et al. (“Campbell”). Insofar as the rejections may be applied to the claims as amended, the applicants respectfully request that the rejections be withdrawn for reasons including the following, which are provided by way of example.

As described in the application, the invention is directed to solving the problem of providing “a capacitive-type semiconductor sensor with a plurality of single axis sensor formed on a single semiconductor substrate, wherein the numbers of pads for the sensors can be reduced and the parasitic capacitances of the sensors can be equalized to prevent phase shift between detection signals.” (Specification page 3, lines 25 – page 4, line 2.)

Independent claim 1 recites in combination, for example, “a shared pad connected to the fixed electrodes of the plurality of sensor chips and shared thereby;” and “wirings connecting the fixed electrodes of the plurality of sensor chips and the shared pad, wherein the wirings are symmetrically formed with respect to wiring resistances from the shared pad to the fixed electrodes of the sensor chips.” Thereby, the number of pads for the fixed electrodes of the sensor chips can be reduced. For example, the number of pads is reduced from four in Fig. 6 to

two in the embodiment illustrated in Fig. 1. Moreover, the wiring resistances, etc. between the sensor chips can be equalized so that phase differences in pulse voltage can be reduced.

The office action argues that Geen and Campbell teach the invention as claimed, except that Geen and Campbell fail to teach or suggest the “pads” for the interconnected electrodes. The office action argues that Fig. 4 of the present specification teaches “pads” connecting electrodes. To the contrary, Geen or Campbell fails to teach or suggest the invention, as presently claimed, when the claims are considered as a whole.

The office action argues that it would have been obvious to provide pads for multiple electrodes. However, the references, alone or as modified as proposed in the office action, fail to teach or suggest “a shared pad connected to the fixed electrodes of the plurality of sensor chips and shared thereby” (see amended claim 1).

Moreover, Geen and Campbell fail to teach or suggest that “the wirings are symmetrically formed with respect to wiring resistances from the shared pad to the fixed electrodes of the sensor chips,” as recited in amended claim 1.

Geen and Campbell, alone or combined, fail to teach or suggest, for example, these elements recited in independent claim 1. It is respectfully submitted therefore that claim 1 is patentable over Geen and/or Campbell.

For at least these reasons, the combination of features recited in independent claim 1 when interpreted as a whole, is submitted to patentably distinguish over the prior art. In addition, Geen and Campbell clearly fail to show other recited elements as well.

With respect to the rejected dependent claims, applicant respectfully submits that these claims are allowable not only by virtue of their dependency from independent claim 1, but also because of additional features they recite in combination.

Claim 2 was not rejected as being anticipated or obvious. Therefore, it is respectfully submitted that claim 2 is allowable.

New claims 4 – 6 have been added to further define the invention, and are believed to be patentable for reasons including these set out above. Support for new claim 4 is located in the specification as filed, for example in Fig. 1. Support for new claims 5 – 6 is also located in the specification as filed, for example in Figs. 2 – 3 and claims 2 – 3.

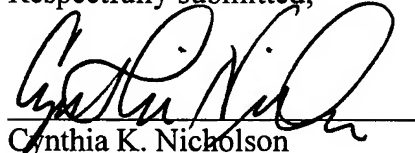
The applicant respectfully submits that, as described above, the cited prior art does not show or suggest the combination of features recited in the claims. The applicant does not concede that the cited prior art shows any of the elements recited in the claims. However, applicant has provided specific examples of elements in the claims that are clearly not present in the cited prior art.

The applicant strongly emphasizes that one reviewing the prosecution history should not interpret any of the examples applicant has described herein in connection with distinguishing over the prior art as limiting to those specific features in isolation. Rather, for the sake of simplicity, the applicant has provided examples of why the claims described above are distinguishable over the cited prior art.

In view of the foregoing, the applicant respectfully submits that this application is in condition for allowance. A timely notice to that effect is respectfully requested. If questions relating to patentability remain, the examiner is invited to contact the undersigned by telephone.

Please charge any unforeseen fees that may be due to Deposit Account No. 50-1147.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Cynthia K. Nicholson', written over a horizontal line.

Cynthia K. Nicholson

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